UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
Tuong Nguyen
Chapter 7

Debtor (s)
Case No: 19-14310ELF

MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

Tuong Nguyen, hereinafter referred to as "Debtor" moves this Honorable Court for an Order allowing Debtor's case to be converted from Chapter 7 to Chapter 13 and aver the following:

- Debtor filed for relief under Chapter 7 of the Bankruptcy code on July 8th,
 2019.
- Subsequently, the Debtor's continue 341 Meeting of Creditors was concluded on September 12th, 2019.
- 3. On or about October 10th, 2019, an Adversary Proceeding and Complaint were filed by the United States Trustee, pursuant to 11 U.S.C. Section 727.
- 4. By and through Debtor's Counsel, a stipulated agreement was reached to allow the Debtor to proceed in this case under Chapter 13 of the Bankruptcy Code. See Stipulation and Agreement marked as "Exhibit A."
- Debtor shall additionally file a Chapter 13 Plan, and the necessary
 Amended Schedules to proceed under Chapter 13 of the Bankruptcy Code.

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WHEREFORE, the Debtor requests an Order allowing his case to be converted from Chapter 7 to Chapter 13 Bankruptcy.

Dated: December 18, 2019

/s/Brad J. Sadek, Esq. Brad J. Sadek, Esq. Attorney for Debtor 1315 Walnut Street Suite #502 Philadelphia, PA 19107